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April 24, 2006

The Honorable Charles Terreni
Chief Clerk of the Commission
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: Application of Palmetto Utility Protection Service, Incorporated for Assignment
of the 811 Abbreviated Dialing Code to be Implemented in South Carolina
Generic Proceeding to Investigate Emergency Services Continuity Plans
Docket No. 2005-390-C

Dear Mr. Terreni:

Enclosed for filing are the original and one copy of BellSouth Telecommunications, Inc.'s ("BellSouth's") Surrebuttal Testimony of Kathy K. Blake in the above-referenced matter. This document is an exact duplicate of the e-filed copy submitted to the Commission in accordance with its electronic filing instructions.

By copy of this letter, I am serving all parties of record with a copy of this testimony as indicated on the attached Certificate of Service.

Sincerely,

A handwritten signature in black ink that reads "Patrick W. Turner". The signature is written in a cursive, flowing style.

Patrick W. Turner

PWT/nml
Enclosure
cc: All Parties of Record
DM5 #631306

1 BELLSOUTH TELECOMMUNICATIONS, INC.
2 SURREBUTTAL TESTIMONY OF KATHY K. BLAKE
3 BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA
4 DOCKET NO. 2005-390-C
5 APRIL 24, 2006

6
7 Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH
8 TELECOMMUNICATIONS, INC. ("BELLSOUTH"), AND YOUR
9 BUSINESS ADDRESS.

10
11 A. My name is Kathy K. Blake. I am employed by BellSouth as Director – Policy
12 Implementation for the nine-state BellSouth region. My business address is
13 675 West Peachtree Street, Atlanta, Georgia 30375.

14
15 Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS PROCEEDING?

16
17 A. Yes. I filed Direct Testimony on April 12, 2006.

18
19 Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?

20
21 A. My surrebuttal testimony addresses certain aspects of Mr. James Glyn Smith's
22 Rebuttal Testimony that was filed on April 19, 2006, on behalf of Palmetto
23 Utility Protection Services, Inc. ("PUPS").

24

1 Q. ON PAGE 3 OF HIS REBUTTAL TESTIMONY, MR. SMITH ASKS THE
2 COMMISSION TO REQUIRE BELLSOUTH AND OTHER CARRIERS TO
3 FILE 811 SERVICE TARIFFS WITH THE COMMISSION BY MAY 15,
4 2006. DOES THE FCC'S *811 ORDER* SUPPORT MR. SMITH'S REQUEST
5 FOR A MAY 15, 2006 FILING DEADLINE?

6
7 A. No, it does not. As Mr. Smith acknowledges on page 6 of his Direct
8 Testimony, the FCC's *811 Order* requires implementation of the service by
9 April 2007. Nothing in the FCC's *811 Order* supports Mr. Smith's request
10 that carriers be required to develop, test, and tariff the service nearly a year
11 before that date.

12
13 Q. WHAT IS BELLSOUTH'S POSITION REGARDING MR. SMITH'S
14 REQUEST FOR A MAY 15, 2006 DEADLINE FOR FILING 811 TARIFFS?

15
16 A. BellSouth opposes this request. On pages 6-7 of his Direct Testimony, Mr.
17 Smith states that PUPS needs to know "what charges may be requested by the
18 carriers" for 811 service so that PUPS can use this information in its
19 "budgeting process." As a courtesy to PUPS, BellSouth has voluntarily agreed
20 to provide that information to PUPS by June 30, 2006.

21
22 Providing information that PUPS can use in its budgeting process, however, is
23 much different than finalizing a tariff for the 811 service. BellSouth is still in
24 the product development stage for its 811 service and will not be in a position
25 to file a tariff containing all the associated terms and conditions until the

1 service is fully developed and tested. Once that has occurred, BellSouth will
2 be in a position to craft the tariff that sets out the rates, terms, and conditions
3 that will apply to its 811 service.
4

5 Q. DO YOU HAVE ANY COMMENTS REGARDING MR. SMITH'S
6 BELIEF, STATED AT PAGE 3 OF HIS REBUTTAL TESTIMONY, THAT
7 "UNDER THE FCC ORDER, THE CHARGES [FOR THE 811 SERVICE]
8 MUST BE CALCULATED TO RECOVER THE COST OF
9 IMPLEMENTING 811 AND NOTHING MORE."
10

11 A. Not at this time. The issue in this proceeding is whether the Commission
12 should grant PUPS' application for assignment of the 811 code, not what the
13 charges for the 811 service should be. Mr. Smith himself acknowledges this
14 on page 7 of his Direct Testimony (agreeing that PUPS does not "seek a ruling
15 from this Commission in this proceeding on what may be charged by wireline
16 and wireless carriers for implementation of the FCC's 811 plan") and on page
17 3 of his Rebuttal Testimony (acknowledging that PUPS does not "now seek a
18 ruling in this proceeding on what may be charged" for the 811 service). In the
19 unlikely event that BellSouth's charges for the 811 service become an issue in
20 a future proceeding, BellSouth will address Mr. Smith's "belief" at that time, if
21 necessary.
22

23 Q. DOES THIS CONCLUDE YOUR TESTIMONY?
24

25 A. Yes, it does.

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND) CERTIFICATE OF SERVICE

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused BellSouth Telecommunications, Inc.'s Surrebuttal Testimony of Kathy K. Blake in Docket No. 2005-390-C to be served upon the following this April 24, 2006:

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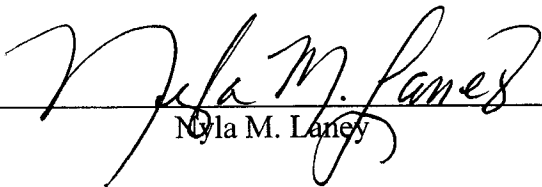
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